

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

| | | |
|------------------------------|---|-----------------------|
| ROBIN DECHELL HOLLEY, |) | |
| |) | CIVIL ACTION NO.: |
| Plaintiff, |) | |
| |) | 1:20-cv-00160-JPB-CCB |
| v. |) | |
| |) | |
| TRANS UNION, LLC, and CASTLE |) | |
| CREDIT CO HOLDINGS, LLC, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANT CASTLE CREDIT CO HOLDINGS, LLC’S OBJECTION TO
PLAINTIFF’S SECOND MOTION FOR EXTENSION OF TIME FOR
PLAINTIFF TO RESPOND TO DEFENDANT CASTLE CREDIT CO
HOLDINGS, LLC’S MOTION FOR SUMMARY JUDGMENT**

COMES NOW Defendant Castle Credit Co Holdings, LLC (“Castle Credit”) and objects to Plaintiff’s Second Motion for Extension of Time for Plaintiff to Respond to Defendant Castle Credit Co Holdings, LLC’s Motion for Summary Judgment (“Plaintiff’s Second Motion for Extension”). Defendant Castle Credit respectfully shows this honorable Court the following in support of Defendant’s objection:

On December 10, 2021, counsel for Plaintiff requested a 30-day extension of the December 13, 2021, deadline to respond to Defendant Castle Credit’s Motion for Summary Judgment. Counsel for Defendant Castle Credit responded on

December 10, 2021 and denied the request for a 30-day extension due to the many extensions already granted in the case. Counsel for Defendant Castle Credit did, however, grant a 7-day extension as a professional courtesy to counsel for Plaintiff. Plaintiff filed a Joint Motion for Extension, and the court granted the motion extending the deadline to December 20, 2021.

On December 20, 2021, Plaintiff requested another extension from counsel for Defendant Castle Credit for identical reasons set forth in the initial request for a 30-day extension. Counsel for Defendant Castle Credit was out of office on December 20, 2021, offline and unavailable. Quite frankly, counsel for Defendant Castle Credit was not expecting another request as he made his position clear a week prior. Had counsel for Defendant Castle Credit been available, the request would have been denied as a 7-day request was already granted and there was no apparent change in circumstances justifying the request for the additional time other than a failure to prioritize working on this matter in the past week. Consequently, Plaintiff's Second Motion for Extension has two inaccuracies. Defendant Castle Credit did not consent to an extension and the motion is not unopposed.

WHEREFORE, Defendant Castle Credit prays that the Court DENY Plaintiff's Motion and require Plaintiff to immediately respond to Defendant's motion for summary judgment.

Respectfully submitted this 21st day of December, 2021.

BROCK & SCOTT, PLLC

By: /s/ Kyle S. Kotake
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Castle Credit Co Holdings, LLC

L.R. 7.1 CERTIFICATE OF COMPLIANCE

Per L.R. 7.1D, I certify this pleading was prepared per L.R. 5.1C in Times New Roman, 14 point typeface.

This 21st day of December, 2021.

BROCK & SCOTT, PLLC

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CERTIFICATE OF SERVICE

The undersigned certifies that a precise copy of the foregoing
**DEFENDANT CASTLE CREDIT CO HOLDINGS, LLC'S MOTION FOR
SUMMARY JUDGMENT** was served on the parties via efilng.

This 21st day of December, 2021.

BROCK & SCOTT, PLLC

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